

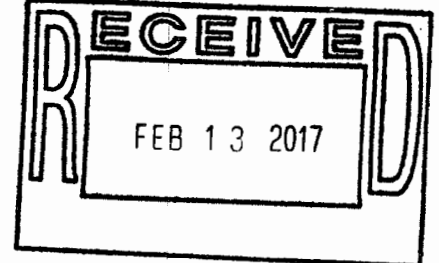
IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KEVIN MCKEITHER

V.

VINCENT MOONEY, ET AL.

CA# 14-CV-1628



PETITIONER'S SECOND MOTION TO AMEND/ADD TO  
SUPPORT AMENDMENT/MOTION

**FILED**

FEB 13 2017

KATE BARKMAN, Clerk  
By \_\_\_\_\_ Dep. Clerk

Petitioner aver's that there were several Constitutional violations in regards to Transportation from State to State, the fact that Michigan has possession of petitioner's body, but the State of virginia had petitioner listed there at the same time, ***Please See Attached Exhibit (C)*** for proof. this constitutes a **"Straw Man"** violation (By that) petitioner, was used as a third party used in some transaction as a temporary transferee to allow the principal parties to accomplish something that is otherwise impermissible (***Dummy***). It appears that defendants violated petitioner's substantive **"Due Process"** rights as the result of a **"Government Interference"** and **"Liberty Clause,"** it appears that petitioner's **"Government Interference"** and **"Liberty Clause"** claim is premised on the same facts which give rise to his civil rights and constitutional claims. Namely the February 2011 seizure and petitioner's subsequent efforts to pursue his criminal charges. Petitioner claims that **"Individuals"** have a constitutional liberty interest in **"Personal Bodily"** integrity that is protected by the Due Process clause of the 14th Amendment and does not impose an affirmative obligation on the State to protect it's citizens, but Courts have recognized that a State actor maybe held liable under the

"Liberty Clause" when a relationship between the State and the plaintiff existed such that the plaintiff was a foreseeable victim of the defendants acts, or a member of a discrete class or persons subjected to the potential harm brought about by the State's actions as opposed to a member of the public in general and the harm ultimately caused was foreseeable and fairly directed; the State acted with a degree of culpability that shocks the conscience;

**WHEREFORE**, because of the actions by State Officials in these matters and the lack of regards to the United States Constitution "Liberty Clause" petitioner has a lack of confidence with respect to security of his person's and therefore respectfully request immediate release.

DATE: FEBRUARY 2017

Respectfully Submitted,

/s/ Karrison McKeithen

PROOF OF SERVICE

I hereby certify that I am, this day, serving the foregoing document upon the persons and in the manner indicated below, which service satisfies the requirements of Pa. R. Crim. P. 577.

DISTRICT ATTORNEY  
3, SOUTH PENN SQUARE  
PHILA, PA 19107  
Type of Service  
☐ Personal ☒ First Class Mail

OFFICE OF THE CLERK  
UNITED STATES DISTRICT COURT  
PHILADELPHIA, PA. 19106-9865  
Type of Service  
☐ Personal ☒ First Class Mail

**FILED**  
**FEB 13 2017**  
KATE BARKMAN, Clerk  
By \_\_\_\_\_ Dep. Clerk

Type of Service  
☐ Personal ☐ First Class Mail

Type of Service  
☐ Personal ☐ First Class Mail

DATE: 2-8-17

Kerion McKeithen  
Signature of Server

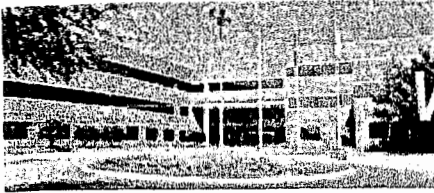
\*NOTE: Under 18 Pa.C.S.A. 4904 (Unsworn falsification to Authorities), a knowingly false proof of service constitutes a misdemeanor of the second degree.

Exhibit C

Virginia.gov

Online Services | Commonwealth Sites | Help | Governor

Search Virginia.gov



## Virginia Department of Corrections

Contact Us | Search this Site



Home &gt; Offenders &gt; Offender Locator &gt; Search

About Us

- Communications
- Victim Services
- Offenders
- Facilities
- Community Corrections
- Career Opportunities
- Procurement
- Forms
- Resources and Links
- Board of Corrections
- Virginia Parole Board

## Offender Locator Search Results

Search Result: 1 Match Found

Offender Name:	Mckeith, Kevin Devon
DOC Number:	1202965
Inmate Number:	382711
Gender:	Male
Race:	Black
Location:	Deep Meadow Correctional Center
Projected Release Date:	03/28/2016

[« New Search](#)

These records are updated once per day. Information is subject to change without notice. For assistance, please contact the Offender Management Unit.

[Start of Page](#) | [Start of Content](#)

For Comments or Questions, contact

DOC

©1997-2010

Commonwealth of Virginia, Virginia Department of Corrections

Plugins:

[Adobe Acrobat Reader \(.pdf\)](#)[Word Viewer \(.doc\)](#)[Excel Viewer \(.xls\)](#)

W3C WAI-AA WCAG 1.0

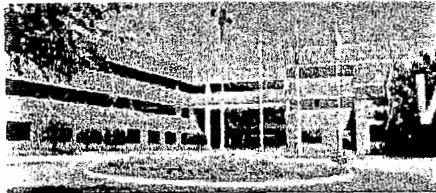
[Skip to Content](#) | [FOIA Notice](#) | [Web Policy](#) | [Contact Us](#)





[Online Services](#) | [Commonwealth Sites](#) | [Help](#) | [Governor](#)

[Search Virginia.gov](#)



# Virginia Department of Corrections

[Contact Us](#) | [Search this Site](#)



[Home](#) > [Facilities](#) > [Central Region](#), [Deep Meadow Correctional Center](#)

➤ [Communications](#)

➤ [Victim Services](#)

➤ [Offenders](#)

➤ [Facilities](#)

➤ [Community Corrections](#)

➤ [Career Opportunities](#)

➤ [Procurement](#)

➤ [Forms](#)

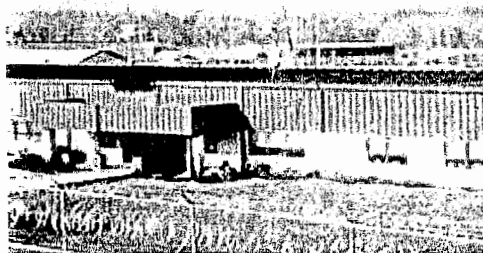
➤ [Resources and Links](#)

➤ [Board of Corrections](#)

➤ [Virginia Parole Board](#)

## Central Region

### Deep Meadow Correctional Center



Located in Powhatan County.

**Alton Baskerville, Warden**  
State Farm, VA 23160  
(804) 598-5503

#### Security Level 2 - Assignment Criteria:

No Escape History within past 5 years. Single Life sentences must have reached their Parole Eligibility Date (PED). No disruptive behavior for at least past 24 months prior to consideration for a transfer to any less-secure facility.

#### Specifications:

- Opened - 1989
- Average Daily Population (October 2008) - 840
- Special Populations - Classification for wheelchair bound inmates
- Special Programs - Reentry
- Site Additions/Upgrades - Programs Building
- Virginia Correctional Enterprises - N/A

#### Directions From Richmond:

Take U.S. Route 60 (Midlothian Turnpike) West to State Route 522. Turn right on 522 and continue to its intersection with State Route 711. Turn right on 711 and continue until you see signs reading "Powhatan"



[HELP](#) | [CONTACT US](#) | [LOGOUT](#)

[MY HOME](#)

[MONEY](#)

[MY ACCOUNT](#)

## Search Results

**SEARCH RESULTS** (Select inmate name to continue)

INMATE NAME	INMATE ID	FACILITY NAME	STATE
MCKEITHER, KEVIN	HV5414	Pennsylvania State Prison System	PA

[Click here if your inmate is not on the list](#)

[BACK](#)

Correctional Center." Deep Meadow is the next correctional facility to the left.

[Start of Page](#) | [Start of Content](#)

For Comments or Questions, contact

DOC

©1997-2010

Commonwealth of Virginia, Virginia Department of Corrections

Plugins:

[Adobe Acrobat Reader \(.pdf\)](#)

[Word Viewer \(.doc\)](#)

[Excel Viewer \(.xls\)](#)

W3C WAI-AA WCAG 1.0

[Skip to Content](#) | [FOIA Notice](#) | [Web Policy](#) | [Contact Us](#)



KEVIN McKEITHEN  
HV-5414  
660 STATE ROUTE 11  
HUNLOCK, CREEK, PA.

18621-3136

INVESTIGATIVE  
DEPT. OF CORRECTIONS  
HALL-PA

OFFICE OF THE CLERK  
UNITED STATES DISTRICT COURT  
PHILADELPHIA, PA 19106-9865